

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NEW JERSEY BUILDING LABORERS
PENSION FUND,

Plaintiff,

v.

C.A. No. 11-cv-1153-LPS

F. MICHAEL BALL, HERBERT W. BOYER,
Ph.D., DEBORAH DUNSIRE, M.D.,
JEFFREY L. EDWARDS, MICHAEL R.
GALLAGHER, DAWN HUDSON, ROBERT
A. INGRAM, TREVOR M. JONES, Ph.D.,
LOUIS J. LAVIGNE, JR., DAVID E.I.
PYOTT, RUSSELL T. RAY, STEPHEN J.
RYAN, M.D., and SCOTT M. WHITCUP,

Defendants,

and

ALLERGAN, INC.,

Nominal Defendant.

STIPULATION AND [PROPOSED] ORDER OF DISMISSAL

IT IS HEREBY STIPULATED AND AGREED among the parties, through their undersigned attorneys and subject to the approval of the Court, that all claims asserted in the above-captioned action are dismissed with prejudice pursuant to Federal Rules of Civil Procedure 23.1 and 41(a)(1). Each party shall bear his, her or its own costs and attorneys' fees.

RIGRODSKY & LONG, P.A.

/s/ Brian D. Long

Seth D. Rigrodsky (#3147)
Brian D. Long (#4347)
Gina M. Serra (#5387)
919 N. Market Street, Ste 980
Wilmington, DE 19801
(302) 295-4232
sdr@rigrodskylong.com
bdl@rigrodskylong.com
gs@rigrodskylong.com
Attorneys for Plaintiff
New Jersey Building Laborers Pension Fund

FISH & RICHARDSON P.C.

/s/ Joseph B. Warden

Joseph B. Warden (#5401)
222 Delaware Avenue, 17th Floor
P.O. Box 1114
Wilmington, DE 19899-1114
(302) 652-5070
jbw@fr.com
Attorneys for Nominal Defendant
Allergan, Inc.

MORRIS, NICHOLS, ARSHT & TUNNELL
LLP

/s/ Kenneth J. Nachbar

Kenneth J. Nachbar (#2067)
Shannon E. German (#5172)
1201 North Market Street, 18th Floor
P.O. Box 1347
Wilmington, DE 19899-1347
(302) 658-9200
knachbar@mnat.com
sgerman@mnat.com
Attorneys for Defendants F. Michael Ball,
Herbert W. Boyer, Ph.D., Deborah Dunsire,
M.D., Jeffrey L. Edwards, Michael R.
Gallagher, Dawn Hudson, Robert A. Ingram,
Trevor M. Jones, Ph.D., Louis J. Lavigne, Jr.,
David E.I. Pyott, Russell T. Ray, Stephen J.
Ryan, M.D., and Scott M. Whitcup, M.D.

It is SO ORDERED this ____ day of _____, 2014.

THE HONORABLE LEONARD P. STARK